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RSPA-98-4868-21

November 21, 1991

Associate Administrator for Pipeline Safety
Dockets Unit, Room 2417
Research and Special Programs Administration
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, D.C. 20590

Subject: Comments on Notice of Proposed Rulemaking (NPRM)
Research and Special Programs Administration (RSPA)
Gathering Line Definition (Docket No. PS-122, Notice 1)

Dear Sirs:

Enogex Inc., an intrastate natural gas pipeline company headquartered in Oklahoma City, Oklahoma, desires to comment on the subject notice of proposed rulemaking, as specified below.

A wholly-owned subsidiary of Oklahoma Gas and Electric Company, Enogex Inc. is ranked 31st in the nation in miles of natural gas pipelines in operation - with 980 miles of currently classified transmission lines and 2,021 miles of gathering lines, all within the state of Oklahoma. Enogex Products Corporation, a subsidiary of Enogex Inc., currently owns and operates six natural gas processing plants in Oklahoma.

With regard to the subject notice, Enogex agrees with the concept to tie the primary definition for gathering line end-point to the inlet of the first processing plant. However, we feel a clear definition of Gas Processing Plant needs to be included in the Definitions of 192.3.

When this definition does not apply (i.e., there is no processing plant), we think the notice needs more clarification, as follows:

1. In the second alternative to gathering line end-point determination, D.O.T. presumably does not intend the "point where custody of gas is transferred" to be at the wellhead, as this would render all pipelines to be transmission lines. We recommend clarification by re-stating as follows - "first point where custody of gas is transferred downstream of the production facility", which would infer the transfer of the gas to another pipeline or end-user downstream from the wellhead.

2 The third alternative, "...the last point downstream where gas produced in the same production field or two adjacent production fields is commingled", causes Enogex the most concern because of the possibility of broad interpretation of the terms "production field" and "commingled". The term "commingling" is ambiguous and could result in approximately 400 miles of Enogex gathering lines being reclassified to transmission lines, depending on where "the last point where commingling occurs" is interpreted by regulatory personnel. This reclassification, if warranted, would result in an increase of approximately \$16,000 in our state and federal pipeline safety assessments, not to mention possible increased associated costs of operation and maintenance.

Finally, we would recommend that any pipelines reclassified as a result of this rulemaking be "grandfathered" (as of the date the final rule is issued) from D.O.T.'s design, construction, and testing requirements in 49 CFR Part 192, thus rendering the reclassified lines subject only to the operating and maintenance requirements.

Enogex appreciates the opportunity to express out concerns regarding this proposed rulemaking. We would be willing to discuss or elaborate further on these issues at your convenience. Thank you for your consideration.

Yours very truly,



Donald E. McCoy
Director, Corporate Services

cc: Alan Stacy
Charlie Moore
John Morozuk
Pat Ashby